

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA**

Case No: 1:17-mj- 73

AFFIDAVIT OF DEA TASK FORCE OFFICER JAMES HIXSON

I, James C. Hixson, being duly sworn, depose and state as follows:

1. I am a Task Force Officer with the Drug Enforcement Administration Field Office in Chattanooga, Tennessee. I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7), in that I am empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516.

2. I have been employed as a Police Officer with the Chattanooga Police Department for the past 22 years. I have been assigned as a Police Officer/Investigator in Narcotics/Street Crimes Unit for three years. I am currently assigned as a Task Force Officer for the Drug Enforcement Administration ("DEA") Resident Office in Chattanooga, Tennessee. I have been a Task Force Officer for the past 13 years. As a Police Officer/Investigator, I gained a working knowledge in narcotics-trafficking methods and techniques. My present duties include the investigation of violations of federal law by individuals involved in the sale and distribution of controlled substances. I have had specialized training with respect to narcotics violations and have conducted numerous investigations involving the seizure of controlled substances. I have obtained the information contained in this affidavit through personal observation and investigation, information related by fellow law enforcement officers, cooperating defendants, witnesses, and informant statements.

3. This affidavit is submitted in support of the applications for search warrants relating to the following properties:

- 1214 Belmeade Ave., Chattanooga, Tennessee;
- 9647 Homewood Circle, Ooltewah, Tennessee;
- 7434 Allemande Way, Bldg. 11, Apt. 104, Chattanooga, Tennessee;
- 4429 Highway 58, LifeStorage, Unit D308, Chattanooga, Tennessee;

- 1346 Hickory Valley Rd., CubeSmart Self-Storage, Unit 701, Chattanooga, Tennessee;
- 6497 East Brainerd Rd., Public Storage, Unit D327, Chattanooga, Tennessee;
- 5405 Autumn Wood Dr., Chattanooga, Tennessee; and
- 8578 Syntex Ln., Ooltewah, Tennessee.

The information contained in this affidavit has been related to your affiant by fellow law enforcement officers and witnesses, and is also premised on information gathered throughout the course of the investigation to date.

4. Based upon your affiant's training, experience, and participation in investigations involving large or numerous quantities of narcotics and/or controlled substances, your affiant knows:

- a. That drug traffickers very often place assets in names other than their own to avoid detection of these assets by government agencies;
- b. That even though these assets are in other persons' names, the drug traffickers actually own and continue to use these assets and exercise dominion and control over them;
- c. That narcotics traffickers keep large amounts of U.S. currency on hand in order to maintain and finance their ongoing narcotics business;
- d. That narcotics traffickers maintain books, records, receipts, notes, ledgers, airline tickets, money orders, and other papers and documents relating to the transportation, ordering, sale, and distribution of controlled substances.
- e. That narcotics traffickers commonly "front" (provide narcotics on consignment) controlled substances to their clients; that the aforementioned books, records, receipts, notes, ledgers, etc. are maintained in their residences, businesses and/or other locations where the traffickers have ready access to them;
- f. That it is common for drug dealers to secrete contraband, proceeds, of drug sales, and records of drug transactions in secure locations within their residences and/or their businesses for their ready access and to conceal from law enforcement authorities;

- g. That it is common for drug dealers to secrete contraband, proceeds of drug sales, and records of drug transactions in secure locations within their residences, their businesses and/or other locations which they maintain dominion and control over, for ready access and to conceal these items from law enforcement authorities;
- h. That it is common for persons involved in narcotics trafficking to maintain evidence pertaining to their obtaining, secreting, transfer, concealment and/or expenditure of narcotics proceeds, such as: currency, financial instruments, precious metals and gemstones, jewelry, books, records, invoices, receipts, records of real estate transactions, bank statements and related records, passbooks, money drafts, letters of credit, money orders, bank drafts, cashiers checks, bank checks, safe deposit box keys, and money wrappers. These items are routinely maintained by the narcotics trafficker within their residences, businesses, or other locations which they maintain dominion and control over;
- i. That drug traffickers often utilize electronic equipment such as computers, telex machines, facsimile machines, currency counting machines, video surveillance equipment, and telephone answering machines to generate, transfer, count, record and/or store information described in the aforementioned paragraphs above;
- j. That when drug traffickers amass large proceeds from the sale of narcotics that the drug trafficker's attempt to legitimize these profits through money laundering activities. To accomplish these goals, drug traffickers utilize, including but not limited to, domestic and international banks and their attendant services, securities brokers, professionals such as attorneys, and accountants, real estate, and business fronts and otherwise legitimate businesses which generate large quantities of currency;
- k. That drug traffickers commonly maintain addresses of telephone numbers in books or papers which reflect names, addresses, and/or telephone numbers of their associates in the trafficking organization;
- l. That drug traffickers take or cause to be taken photographs of themselves, their associates, and/or their property with their product. These traffickers usually maintain these photographs in their possession;
- m. That drug traffickers commonly have in their possession, that is, on their person, at their residences, and/or at their place of businesses, firearms,

including but not limited to: handguns, pistols, revolvers, rifles, shotguns, machine guns, and other weapons. Said firearms are used to protect and secure a drug trafficker's property. Such property may include, but is not limited to narcotics, jewelry, narcotics paraphernalia, books, records, and U.S. currency.

5. Agents of the DEA, United States Postal Service ("USPS"), Federal Bureau of Investigations ("FBI"), and Tennessee Bureau of Investigations ("TBI") in Chattanooga, Tennessee have identified Tommy DEAN, Tyrone PARKS, James JOHNSON, Daniel JOHNSON, Waverly DONALDSON, and others not named as members of a significant cocaine trafficking organization operating in the Eastern District of Tennessee. These individuals have been investigated by various law enforcement agencies in Chattanooga, Tennessee for their involvement in distributing cocaine. Since October 2016, your affiant has received information from USPS that this organization is distributing large quantities of cocaine in Chattanooga, Tennessee.

6. The following information pertains to the criminal histories of Tommy DEAN, Tyrone PARKS, Daniel JOHNSON, James JOHNSON, and Waverly DONALDSON. Your affiant was able to review only the disposition of cases as it appears on NCIC records. In addition, your affiant only provides herein criminal history pertaining to acts of violence and narcotic related offenses. Your affiant was not able to locate any criminal history for James JOHNSON and Waverly DONALDSON.

7. The following information pertains to the criminal history of Tommy DEAN: In March 1991, DEAN was arrested by the Chattanooga Police Department for aggravated assault with intent to commit murder. In November 1991, DEAN was arrested by the DEA for his involvement in a conspiracy to distribute cocaine and was sentenced to 132 months in prison. In February 2007, DEAN was arrested by the TBI for possession of marijuana for resale; DEAN pled guilty to that charge and received a 2 year sentence.

8. The following information pertains to the criminal history of Tyrone PARKS: In February 1988, PARKS was arrested for possession of cocaine for resale. In May 1994, PARKS was again arrest by the Chattanooga Police Department for possession of cocaine for resale and aggravated assault. In October 1994, PARKS was arrested by the Chattanooga Police Department for possession of cocaine and possession of drug paraphernalia. In January 1996, PARKS was arrested and convicted of

voluntary manslaughter, for which he was sentenced to 4 years in a Tennessee Department of Corrections facility.

9. The following is information concerning the criminal history of Daniel JOHNSON: In March 2005, Daniel JOHNSON was arrested by the Chattanooga Police Department for possession of crack-cocaine for resale and felony possession of a firearm.

10. In September 2016, USPS agents began investigating a California-based drug-trafficking organization (“DTO”) distributing multi-kilogram quantities of cocaine across the United States. The DTO used the United States Mail to facilitate shipment and distribution of illegal narcotics and currency to and from drug purchasers. Since January 2016, USPS agents have identified approximately 228 packages associated with this DTO either by sender information, mailing addresses, or recipient addresses. USPS agents have confirmed via surveillance or other means that at least 30 packages of the 228 were sent by Jonathan CAREY or one other identified associate.

11. In September 2016, law enforcement agencies in Cleveland, Ohio intercepted two packages. These packages were mailed from San Bernardino, California and from Hesperia, California on September 1, 2016. Both were delivered to the same address in Cleveland, Ohio. USPS Inspectors confirmed through surveillance and/or video that one of those packages was sent by Jonathan CAREY. The other was sent by an unidentified associate believed to be affiliated with the California-based DTO. One package intercepted by law enforcement – the package sent by Jonathan CAREY – contained 5 kilograms of cocaine wrapped in cellophane, stowed in a plastic storage bin with a lid. The other package contained 2 kilograms of heroin. Law enforcement agents interviewed the suspected recipient in Cleveland, Ohio. The suspect stated that the DTO mistakenly sent 2 kilograms of heroin, and that the shipment should also have contained multi-kilogram quantities of cocaine.

12. In November 2016, via video and/or other surveillance, USPS inspectors confirmed that Jonathan CAREY mailed two packages from Hesperia, California, to separate destinations. Both packages weighed approximately 16 pounds. One package was addressed to a recipient in Birmingham, Michigan. The other was addressed to 1214 Belmeade Avenue, in Chattanooga, Tennessee. Law enforcement agencies in Birmingham, Michigan, intercepted the package addressed to a recipient there. The intercepted package in Birmingham, Michigan contained 6 kilograms of cocaine wrapped in cellophane, stowed in a plastic storage bin with a lid.

13. In December 2016, law enforcement agencies in Niagara Falls, New York intercepted a separate package from the California-based DTO. This package was mailed from San Bernardino, California, addressed to a recipient in Niagara Falls. USPS Inspectors confirmed through surveillance and/or video surveillance that Jonathan CAREY sent this package. On December 23, 2016, law enforcement conducted a controlled delivery of the package. Upon a search of the package, law enforcement discovered that the package contained 5 kilograms of cocaine wrapped in cellophane, stowed in a plastic storage bin with a lid.

14. On December 27, 2016, law enforcement intercepted a package mailed from Chattanooga, Tennessee, addressed to "J. Carey" at 15795 Yosemite St., Victorville, California. This package bore a return address of T. PARKS, 1214 Belmeade Ave., Chattanooga, Tennessee. USPS Inspectors obtained a search warrant to open the package. Inside, they located approximately \$200,000 in U.S. currency. Inspectors weighed and photographed the money before sealing the money back into the package and making an intelligence-gathering delivery of the money. Upon delivering the packages, USPS Inspectors confirmed the package was delivered to the listed address and that Jonathan CAREY took custody of the package.

15. In January 2017, law enforcement agencies in Buffalo, New York intercepted a package believed to be from the California-based DTO. This package was mailed from Apple Valley, California to a recipient in Buffalo. USPS Inspectors confirmed through surveillance and/or video surveillance that this package was sent by Jonathan CAREY. On January 14, 2017 law enforcement conducted a controlled delivery on the package. Upon a search of the package, law enforcement discovered that the package contained 5 kilograms of cocaine wrapped in cellophane, stowed in a plastic storage bin with a lid.

16. Also in January 2017, law enforcement agencies in New York, New York intercepted a package believed to be from the California-based DTO. This package bore a return address from Dave CARSON in 15930 Nisqualli Rd., Victorville, California to a recipient in New York City. A search of public records reveals that 15930 Nisqualli Rd., Victorville, California is an apartment complex with separate buildings, rendering the address listed insufficient. A further records search using public and law-enforcement databases reveals that no one by the name of Dave CARSON is affiliated with that address. USPS Inspectors confirmed through surveillance and/or video surveillance that this package was physically delivered to the post office and sent by Jonathan CAREY. On January 31, 2017, law enforcement conducted a controlled delivery of the package. Upon a search of the package, law

enforcement discovered that the package contained 5 kilograms of cocaine wrapped in cellophane, stowed in a plastic storage bin with a lid.

17. In January 2017, your affiant received notification of this investigation into the California-based DTO. USPS requested assistance in the investigation due to a large number of packages apparently sent from the DTO to Chattanooga and the surrounding areas. Specifically, your affiant was notified of a package, bearing a fictitious name was mailed from the DTO to Daniel JOHNSON at 9647 Homewood Circle, Ooltewah, Tennessee. Your affiant was aware of Daniel JOHNSON from prior cocaine and cocaine base (crack) investigations. As a result of this pending incoming package your affiant formulated plans to make a delivery of the package and conduct surveillance on Daniel JOHNSON subsequent to him taking possession of the package. USPS Inspector Jed Hutchison met with the postal carrier for 9647 Homewood Circle, Ooltewah, Tennessee to discuss the delivery. During the conversation, the postal carrier confirmed delivering similar packages to the residence in the past. Inspector Hutchison provided the postal carrier with a photo of Daniel JOHNSON. The postal carrier confirmed Daniel JOHNSON as the person who had previously taken possession of the similar packages.

18. On January 24, 2017 at approximately 12:36 p.m., USPS delivered the package to 9647 Homewood Circle, Ooltewah, Tennessee. The package in question was addressed to "J. Daniels" with the above-listed address. Record searches in public and/or law-enforcement databases confirm that no one by the name of "J. Daniels" is affiliated with 9647 Homewood Circle. USPS Inspectors confirmed through surveillance and/or video surveillance that this package was physically delivered to the post office and sent by Jonathan CAREY. The package was mailed from Dave CARSON with a sending address of 16950 Jasmine Street, Victorville, California 92395. A search of public records reveals that 16950 Jasmine Street is an apartment complex, rendering the address listed insufficient. A further records search using public and law-enforcement databases reveals that no one by the name of Dave CARSON is affiliated with that address. The postal carrier delivered the package to an individual the carrier knew as Daniel JOHNSON. The postal carrier said that, once he accepted the package, Daniel JOHNSON got on the phone and went back inside the residence.

19. Law enforcement observed a white Infiniti SUV outside the residence during surveillance. The tag displayed on the vehicle was US5575. The tag was not registered to the Infiniti, but to a Chevy Tahoe that was itself registered to Daniel JOHNSON. Surveillance of the residence was conducted for several hours before

being terminated. Public records demonstrate that 9647 Homewood Circle in Ooltewah, Tennessee is a residence owned by Daniel and Dewana JOHNSON.

20. On January 26, 2017, USPS notified Inspector Jedidiah Hutchison of a package addressed to "T. Steal" at 3507 McArthur Avenue, Chattanooga, Tennessee 37411. The package bore the return address of Dave CARSON, 15390 Nisqualli Rd., Victorville, California. A records search of public and law-enforcement databases reveals no one by the name Dave CARSON at that address. USPS Inspectors confirmed through surveillance and/or video surveillance that this package was physically delivered to the post office and sent by Jonathan CAREY.

21. On January 27, 2017, at approximately 9:00 a.m., law enforcement began surveilling 3507 McArthur Avenue by air and on the ground. DEA TFO Michael Thompson went by 3507 McArthur Avenue at approximately 9:42 a.m. and observed a black and orange Chevy Tahoe backed into the driveway with the engine running. The headlights to the vehicle were on and the vehicle was occupied by a black male. Law enforcement officers later confirmed the identity of the driver as Tyrone PARKS.

22. At approximately 10:02 a.m., the Chevy Tahoe left the residence on McArthur and arrived at 1214 Belmeade Avenue, Chattanooga, Tennessee 37411, at approximately 10:05 a.m. The tag displayed on the vehicle was 114 QWX and was found to be registered to Tyrone PARKS. TFO Thompson checked records for 1214 Belmeade Ave., and he found the electrical power to be registered in the name of Tyrone PARKS.

23. At approximately 10:00 a.m., Tyrone PARKS was observed leaving 1214 Belmeade Avenue and drive back to 3507 McArthur Avenue. PARKS was then observed backing in the driveway again and sitting in the car.

24. At approximately 10:26 a.m., your affiant observed PARKS's occupied vehicle backed into the driveway at 3507 McArthur Avenue with the engine running. At approximately 10:39 a.m. Your affiant observed the postal carrier arrive, and PARKS got out of his vehicle and approached the mail carrier. Your affiant observed PARKS retrieve the mail and a package from the postal carrier. Your affiant observed PARKS place the package in his vehicle and leave traveling towards 1214 Belmeade Ave.

25. At approximately 10:43 a.m., your affiant observed PARKS at the residence at 1214 Belmeade Avenue. Your affiant observed PARKS get a package out of the vehicle and go into the residence on Belmeade Avenue.

26. At approximately 12:08 p.m. your affiant observed a black SUV arrive at 1214 Belmeade Avenue and park. Your affiant observed PARKS place a box in the trunk area of the vehicle. (The black SUV was later identified as a GMC Yukon displaying Tennessee tag R17 27M).

27. At approximately 12:16 p.m. a black GMC pickup truck was observed pulling up to the residence. Your affiant observed PARKS place a package into the passenger side of the truck. The tag displayed is Tennessee tag W95 78M, which is registered to Tommy DEAN. At approximately 12:18 p.m. the GMC truck was observed leaving the residence on Belmeade Avenue.

28. Surveillance units followed the GMC pickup truck from the residence on Belmeade Avenue to Hunter Point Apartments, located at 7434 Allemande Way in Chattanooga, Tennessee. Your affiant observed the truck go into the gated apartments and turn into a set of apartments. Your affiant observed the GMC truck pull up in front of building 11, apartment 104. Your affiant observed a black male approach the truck open the passenger side door and remove two of the packages placed into the truck by PARKS. The black male placed one package under his arm and carried the other package in his right hand before entering Apartment 104. After approximately 1 or 2 minutes, the black male returned from the apartment and got into the passenger seat of the GMC truck and leave. Surveillance units saw the driver of the GMC truck and positively identified him as Tommy DEAN.

29. During the above-described surveillance on DEAN, DEA SA Andrew Bergren, SA William Wise, SA Crosby Jones, and TFO William Collins maintained surveillance of 1214 Belmeade Avenue. At approximately 12:23 p.m. SA Wise observed the GMC SUV depart from 1214 Belmeade Avenue. Surveillance units followed the GMC SUV from the residence to Uncle Bob's Storage located at 4429 Highway 58, Chattanooga, Tennessee (the facility is now operated under the business name "LifeStorage"). The GMC SUV pulled into the gated facility and turned down the first row. Once inside the gate, the GMC SUV backed up to unit D308. The black female driver removed the package from the rear of the vehicle and then placed it into the storage unit D308. TFO Mark Delaney executed a subpoena on the business and determined the storage unit is in the name of Waverly DONALDSON. DONALDSON has been identified as the wife/girlfriend of James JOHNSON.

Agents were able to determine the black female driving the GMC SUV was in fact Waverly DONALDSON.

30. On February 01, 2017, a package was mailed from Chattanooga, Tennessee. This package had return information of T. PARKS, 3507 McArthur Ave., Chattanooga, Tennessee. The package was mailed to 15501 Mission Street in Hesperia, California. USPS Inspectors obtained a search warrant to open the package. Upon opening the package USPS Inspectors located approximately \$185,000 in U.S. currency. Inspectors weighed and photographed the money before sealing the money back into the package and making an intelligence gathering delivery of the money. Upon delivering the packages, USPS Inspectors confirmed the package was delivered to another individual known to USPS Inspectors as an associate of Jonathan CAREY involved in the California-based DTO.

31. On February 03, 2017, USPS notified Inspector Hutchison of a package addressed to 9647 Homewood Circle, Ooltewah, Tennessee. A public and law enforcement database search confirms that this address is the residence of Daniel JOHNSON. USPS Inspectors confirmed through surveillance and/or video surveillance that this package was physically delivered to the post office and sent by Jonathan CAREY on February 1, 2017. Law enforcement agents developed a surveillance plan to observe JOHNSON take custody of the USPS package and identify any other individuals associated with JOHNSON.

32. Officers and agents established surveillance at approximately 10:00 a.m., pending the delivery of the package. At approximately 10:33 a.m., the postal carrier arrived at the residence at 9647 Homewood Circle. The postal carrier was observed retrieving a box from the postal vehicle and approaching the residence. TFO Mike Thompson and SA Andrew Bergren observed a large black male exit the residence at 9647 Homewood Circle and meet the postal carrier. The black male took possession of the package while talking on a cellular phone and walked back into the residence. Law enforcement agents subsequently identified the male as Daniel JOHNSON.

33. At approximately 10:45 a.m., surveillance units observed the same black male walk out of the residence and to a white GMC SUV. SA Bergren noted the black male was carrying a bag and placed the item into the passenger compartment of the vehicle. At 10:48 a.m., the black male entered the driver's seat and left in the white GMC SUV. Surveillance units followed the vehicle from the residence to the Public Storage facility located at 6497 East Brainerd Road. Upon arriving at the Public Storage your affiant again identified the driver to be Daniel JOHNSON. TFO Hixson observed JOHNSON punch in a code at the gate of the business and enter. TFO

Thompson observed JOHNSON drive the GMC to a storage building, get out of the vehicle, and remove a bag from the passenger compartment of the vehicle. TFO Thompson then observed JOHNSON place the bag into a storage unit and return to the GMC SUV.

34. At approximately 11:12 a.m., surveillance units observed JOHNSON leave the Public Storage and travel to DXL, a clothing business at Hamilton Place Mall. At approximately 11:56 a.m., SA Bergren entered DXL and saw JOHNSON getting fitted for a suit. Upon SA Bergren leaving the business JOHNSON was observed paying for the suit. Surveillance units then observed JOHNSON walk out of DXL and enter Firebirds Restaurant. Surveillance was then terminated.

35. TFO Thompson went to the Public Storage and executed a subpoena for information pertaining to a storage unit rented by Daniel JOHNSON. As a result of the subpoena it was determined that JOHNSON rented unit D327. Upon investigation, law enforcement agents determined that D327 was the same storage unit Daniel JOHNSON had placed the bag.

36. On February 8, 2017, at approximately 3:00 p.m., your affiant established surveillance at Hunters Point Apartments, located at 7434 Allemande Way. Your affiant surveilled Building 11, Apt 104, the residence to which Tommy DEAN had previously delivered packages suspected to be contraband. Your affiant noted a black GMC pickup truck displaying Tennessee registration W9578M parked in front of the residence.

37. At approximately 3:20 p.m., TFO Hixson observed Tommy DEAN walk from the residence to the black GMC pickup truck. Your affiant followed DEAN as he pulled from the building and exited the complex. Your affiant followed DEAN to his residence at 8578 Syntex Lane, Ooltewah, Tennessee, located in the Stillwater subdivision. Through a records search, your affiant was able to determine that the property at 7434 Allemande Way, Building 11, Apartment 104, is listed in the name of Oliver PARKS. Your affiant has conducted surveillance on this residence and only observed DEAN and the unidentified black male from January 27, 2017, at the residence. Furthermore, based on a records search of public and law enforcement databases, Oliver PARKS appears to reside at 4446 James Drive in Chattanooga, Tennessee. Your affiant, based on my training and experience, believes the property at 7434 Allemande Way, Building 11, Apartment 104, is a "stash house" location, which is utilized by DEAN to distance himself from his illegal activities.

38. On February 10, 2017, DEA assisted Inspector Hutchison with a controlled delivery of a package destined for 1214 Belmeade Avenue, Chattanooga, Tennessee.

39. The day before, on February 09, 2017, USPS notified Inspector Hutchison of a package addressed to 1214 Belmeade Ave., Chattanooga, Tennessee. As described above, your affiant believes this to be the Tyrone PARKS's residence. USPS Inspectors confirmed through surveillance and/or video surveillance that, on February 7, 2017, this package was physically delivered to the post office and sent by Jonathan CAREY.

40. At 10:00 a.m. on February 10, 2017, law enforcement established surveillance of 1214 Belmeade Ave. At approximately 11:28 a.m. SA Bergren observed a black male on the front porch of 1214 Belmeade Ave. At approximately 11:41 a.m. your affiant observed the black male meet the postal carrier at the gate of the residence. Your affiant observed the postal carrier hand the black male the package and talk briefly with the postal carrier. At approximately 11:42 a.m., the postal carrier left the residence and the black male went back inside.

41. At approximately 11:47 a.m., Inspector Hutchison made contact with the postal carrier and the postal carrier stated PARKS was not the black male who received the package. The carrier was not familiar with the black male who took the package. The carrier said the unidentified male said that PARKS was at a funeral. TFO Thompson did confirm that a funeral was going on at this same time at Taylor Funeral Home on Wilcox Boulevard. TFO Delaney also checked the local obituaries and found the funeral was for James Ware and that PARKS was listed as a relative of Mr. Ware in the obituary.

42. TFO Craig Frost surveilled the funeral home and, at approximately 1:20 p.m., saw the GMC truck belonging to DEAN leave. Agents followed the truck to 1214 Belmeade Ave., where your affiant observed the truck park and two black males get out.

43. At approximately 1:27 p.m., a second truck arrived at 1214 Belmeade. An unidentified black male exited the truck and entered the residence. At approximately 1:29 p.m., the unidentified black male left the residence. Prior to getting in his truck, TFO Thompson observed the unidentified male put an item into the passenger side of his truck. The truck departed the residence and several Agents continued surveillance on that truck. Agents followed that truck to CubeSmart storage, located at 1346 Hickory Valley Road, Chattanooga, Tennessee 37421. The tag displayed on the truck was TN 0695H12. The truck had "Unique Home Solutions" in white lettering

displayed on its tailgate. At approximately 1:39 p.m., the truck was observed going into the CubeSmart gated area. At the storage unit, your affiant observed the driver remove an item from the passenger compartment of the vehicle and enter the storage facility. He exited the storage facility with no items in his hands. At approximately 1:46 p.m., the truck left the storage facility. The Tennessee registration displayed on the vehicle revealed the vehicle is registered to James JOHNSON.

44. Surveillance continued on the residence at 1214 Belmeade Ave., and at approximately 1:35 p.m., TFO Thompson observed PARKS and DEAN leave. Surveillance continued on PARKS and DEAN, until they arrived at 1204 Sheridan Ave. Federal Bureau of Investigation (F.B.I.) TFO Matt Hennessee followed DEAN and PARKS and observed DEAN stop in front of the 1204 Sheridan Avenue. DEAN was observed getting out of the truck and going into an apartment by TFO Hennessee. Several minutes later DEAN was observed leaving the apartment on Sheridan Avenue and making several stops before stopping at his residence at 8578 Syntex Lane, Ooltewah, Tennessee.

45. Also in February 2017, law enforcement agencies in Columbia, South Carolina intercepted two packages. These packages were mailed from San Bernardino, California and from Hesperia, California on February 14, 2017 and delivered to 505 North Crossing Drive Columbia, South Carolina and 3414 Beaumont Street Columbia South Carolina. USPS Inspectors have confirmed through surveillance and/or video that both packages were sent by a known associate of Jonathan CAREY. Upon a search of the package, law enforcement discovered that the first package contained 4 kilograms of cocaine wrapped in cellophane, stowed in a plastic storage bin with a lid. The second package intercepted by law enforcement contained 4 kilograms of cocaine wrapped in cellophane, stowed in a plastic storage bin with a lid. USPS Inspectors told your affiant that law enforcement agents conducted a controlled delivery of those packages and arrested several individuals.

46. On March 28, 2017, USPS notified Inspector Hutchison of a package addressed to 1214 Belmeade Ave., Chattanooga, Tennessee. USPS Inspectors confirmed through surveillance and/or video surveillance that, on March 27, 2017, this package was physically delivered to the post office and sent by Jonathan CAREY. Agents developed a plan to surveil the delivery, observe PARKS take custody of the USPS package, and identify any other individuals associated with PARKS.

47. On March 29th, 2017, at 9:00 a.m., law enforcement initiated their plan to surveil 1214 Belmeade Ave while the package was delivered. At approximately

10:01 a.m., TFO Michael Thompson observed a red and white truck parked in front of 1214 Belmeade Ave. The vehicle displayed Tennessee registration F5349W. TFO Thompson conducted a registration inquiry and found the vehicle to be registered to Tyrone PARKS. PARKS's black and orange Chevy Tahoe was parked in the back yard of 1214 Belmeade Ave.

48. At approximately 10:26 a.m., SA Wise observed PARKS wearing a red shirt and brown shorts approach the postal carrier as the carrier arrived. PARKS took the package from the postal carrier and placed it into the bed of the red and white truck. PARKS then carried the package to the backyard of 1214 Belmeade Ave. to the vicinity of the Tahoe parked there, and he then returned to the front yard. Agents believe he entered the house shortly thereafter.

49. At approximately 11:09 a.m., DEAN was observed walking from the front yard area of the residence to the backyard. Your affiant was able to confirm DEAN's vehicle was parked on the roadway in front of PARKS truck.

50. At approximately 11:34 a.m., SA Wise observed a black male, wearing a white t-shirt, standing by PARKS's truck. Shortly thereafter, TFO Thompson drove by the residence and observed James JOHNSON's truck pulling away from PARKS residence. DEAN was observed getting into his truck and was preparing to leave the area. Surveillance units followed both vehicles away from PARKS residence.

51. Agents followed DEAN to his residence at 8578 Syntex Lane. Once at the residence, DEAN parked in the driveway, opened the garage door with a garage door opener, walk into the garage, and shut the garage door. Surveillance units remained in the area for a little while more until it was called off due to lack of activity from DEAN. A public records search confirms DEAN and Tammy Powell are the owners of 8578 Syntex Lane. On at least 2 occasions, your affiant followed DEAN to 8578 Syntex Lane following his receipt of packages believed to contain cocaine. Further, your affiant followed DEAN to 8578 Syntex Lane after DEAN was observed leaving 7434 Allemande Way, Building 11, Apartment 104, a location your affiant believes to be a "stash house." DEAN does not list 8578 Syntex Lane on his driver's license or as his residence on any of his vehicle registrations. Based upon training and experience, your affiant believes DEAN is attempting to conceal the fact that 8578 Syntex Lane is his residence in a further attempt to separate himself from his drug activity.

52. James JOHNSON traveled to the CubeSmart Storage facility located at 1346 Hickory Valley Road, Chattanooga, Tennessee. JOHNSON entered via a keypad gate

at the CubeSmart, at which time Agents established surveillance around the business. SA Bergren observed James JOHNSON remove a box from his vehicle, place it on a hand truck, and pull the box into a storage unit. After a brief period of time JOHNSON returned from the storage unit and got back into his truck and left the premises.

53. At approximately 11:58 a.m., James JOHNSON left the CubeSmart facility and traveled to Faith Baptist Church located at 8834 North Hickory Valley Road, Chattanooga, Tennessee. JOHNSON positioned his vehicle facing traffic, as if to watch for possible surveillance units. JOHNSON sat at the church for several minutes and then went across the street to the neighborhood adjacent to the church. JOHNSON was followed to his residence at 5405 Autumn Wood Drive, Chattanooga, Tennessee. After JOHNSON pulled into the driveway, your affiant observed JOHNSON get out of the vehicle, remove several items from his vehicle and go into his residence.

54. The residence at 5405 Autumn Wood Drive is believed to be the residence of James JOHNSON and Waverly DONALDSON. An inquiry has revealed that DONALDSON currently has utilities in her name at the residence of 5405 Autumn Wood Drive Chattanooga, Tennessee. Additionally, vehicles and driver's license for DONALDSON are registered to 5405 Autumn Wood Drive Chattanooga, Tennessee. Your affiant notes that James Johnson has identified 5405 Autumn Wood Dr. as his residence on an April 1, 2017 police report.

55. On March 30, 2017, USPS notified Inspector Hutchison of a package addressed to 3507 McArthur Avenue, Chattanooga, Tennessee. USPS Inspectors confirmed through surveillance and/or video surveillance that, on March 29, 2017, this package was physically delivered to the post office and sent by Jonathan CAREY. Agents developed a plan to surveil the delivery, observe PARKS take custody of the USPS package, and identify any other individuals associated with PARKS.

56. Officers and agents established surveillance of 3507 McArthur Ave. at approximately 9:30 a.m. on March 31, 2017, pending the delivery of the package. At approximately 9:49 a.m., officers observed PARKS get into a white and red Chevy truck and leave the residence at 1214 Belmeade Ave. and travel to 3507 McArthur Ave in Chattanooga, Tennessee.

57. At approximately 10:02 a.m., the USPS Postal Carrier was observed pulling in front of the residence at 3507 McArthur Ave. The postal carrier was observed

retrieving the box from the postal vehicle and approaching the residence. Officers and agents observed PARKS exit the truck and meet the postal carrier. PARKS took possession of the package and returned to the white and red truck. Surveillance units then observed the truck pull from the premises at 3507 McArthur Ave and travel back to 1214 Belmeade Ave. Surveillance units observed PARKS then remove the package and enter the residence at 1214 Belmeade Ave.

58. At approximately 12:32 p.m., surveillance units observed PARKS walk out of the residence on Belmeade Ave. to a white and red truck and pull away from the residence. Surveillance units followed the vehicle as it made several stops to throw empty boxes away in business dumpsters. Your affiant noted the boxes being discarded did not appear to be the same as the package received at McArthur Ave.

59. At approximately 12:40 p.m., surveillance units observed Tommy DEAN arrive at 1214 Belmeade Ave. DEAN parked his black truck on the street next to 1214 Belmeade Ave. Surveillance units observed the truck also contained another occupant. Both DEAN and the unidentified occupant of the truck were observed loitering about the street and property of 1214 Belmeade, as if they were waiting on someone.

60. At approximately 12:56 p.m. a black Nissan Titan with chrome wheels and a chrome grill arrived at the Belmeade residence. Surveillance units observed the driver of this vehicle to be a black male wearing a light colored hat and t-shirt. Surveillance units observed the driver of the Nissan and DEAN talking outside of their vehicles.

61. At approximately 1:03 p.m., PARKS was observed returning to 1214 Belmeade in the white and red truck. Shortly after PARKS arrived, a white Ford SUV and a minivan arrived at the residence. Surveillance units observed the driver of the Ford SUV stop and talk with DEAN, the black male who was in DEAN's truck, and the driver of the Nissan. A black female passenger was observed getting out of the minivan and walking over to a food trailer parked in the back yard of 1214 Belmeade Ave. The black female then was observed walking back to the minivan and leaving the area. Surveillance units then observed the Ford SUV leave traveling down Tunnel Blvd.

62. At approximately 1:09 p.m., surveillance units observed DEAN and PARKS walk around to the back door of the residence. At approximately 1:15 p.m., DEAN returned from the rear of the residence carrying a white bag. DEAN walked to the

Nissan truck and handed the white bag to the driver. The driver of the truck placed the bag in the passenger side of the truck.

63. At approximately 1:22 p.m., surveillance units observed the Nissan and the truck driven by DEAN leave the residence. Surveillance units followed DEAN to 1500 Dalewood Drive, Chattanooga, Tennessee, where he and the passenger got out of the vehicle and appeared to be in the garage area of the residence. Surveillance of the Nissan truck and DEAN was terminated.

64. On April 2, 2017, USPS notified Inspector Hutchison of a package addressed to 711 Gillespie Road Chattanooga, Tennessee. USPS Inspectors confirmed through interviews with post office staff that, on April 1, 2017, this package was physically delivered to the post office and sent by Jonathan CAREY. USPS Inspectors anticipate reviewing surveillance video in the near future, in order to further confirm this fact.

65. The package mailed on April 1, 2017, arrived at the Chattanooga main post office on April 4, 2017. A police K-9 trained to detect the odor of narcotics was deployed on the package and gave a positive indication of the presence of narcotics. Inspector Hutchison obtained a search warrant for the package, per E.D. Tenn. Case No. 1:17-mj-69, and agents thereafter opened the package. The package contained approximately five kilograms of a substance that tested presumptively positive for cocaine.

66. Since January 2016, approximately 30 packages from the same drug-source area of California – which your affiant believes to originate from the California-based DTO – have been sent to Chattanooga, Tennessee and surrounding areas. Specifically: 9 packages have been sent to 1214 Belmeade Ave., Chattanooga, TN; 8 packages to 9647 Homewood Circle, Ooltewah, TN; 5 packages have been sent to 3507 McArthur Ave, Chattanooga, TN; 4 packages have been sent to 711 Gillespie Rd., Chattanooga, TN; 2 packages have been sent to 2003 Appling Street, Chattanooga, TN; and 2 packages have been sent to 1413 Greenwood Road, Chattanooga, TN. Your affiant has been able to determine that all of these addresses are in some way associated with the Chattanooga drug trafficking organization described herein, e.g., the properties at the addresses belong to members, family members, or known affiliates of this organization.

67. Your affiant submits that probable cause exist to believe that Tommy DEAN, Tyrone PARKS, James JOHNSON, Daniel JOHNSON, Waverly DONALDSON, and others not named operate as a significant cocaine trafficking organization in the

Eastern District of Tennessee and have been involved in a continuing series of narcotics violations since at least October 2016. Your affiant submits that these individuals are utilizing the following addresses as bases for this activity:

- 1214 Belmeade Ave., Chattanooga, Tennessee;
- 9647 Homewood Circle, Ooltewah, Tennessee;
- 7434 Allemande Way, Bldg. 11, Apt. 104, Chattanooga, Tennessee;
- 4429 Highway 58, LifeStorage, Unit D308, Chattanooga, Tennessee;
- 1346 Hickory Valley Rd., CubeSmart Self-Storage, Unit 701, Chattanooga, Tennessee;
- 6497 East Brainerd Rd., Public Storage, Unit D327, Chattanooga, Tennessee;

Your affiant respectfully submits that probable cause has been established to search these properties for the following materials:

- (1) Books, photographs, records, receipts, notes, ledgers and other papers which show the transportation, ordering, purchase, distribution, possession, sale or manufacture of controlled substances;
- (2) Address and/or telephone books and papers reflecting names, addresses, and/or telephone numbers, written or typed by hand as opposed to printed commercially;
- (3) Books, letters, records, computerized and electronic records, receipts, bank statements and records, money drafts, letters of credit, wire transfers, safe deposit box keys, money order and cashier's check receipts, passbooks, bank checks, and other items that reflect the expenditure, obtaining, secreting, transfer or concealment of drug proceeds;
- (4) United States currency, precious metals, jewelry, and financial instruments, including, but not limited to, stocks and bonds, notes and other documents showing an accumulation of assets, wealth, or money to the extent that these items are found in such quantity, substance and/or quality as to permit a reasonable inference that such items are proceeds of drug trafficking;
- (5) Controlled substances, material and paraphernalia for manufacturing, packaging, cutting, weighing and distributing controlled substances, in particular marijuana but not limited to scales, baggies, packing material;

- (6) Indicia of occupancy, residency, and/or ownership of the premises described above and other real property, including but not limited to deeds, utility and telephone bills, canceled envelopes and keys;
- (7) The visual image, by way of photography, of all furnishings and equipment in, on, under, attached, or appurtenant to said premises;
- (8) Papers, tickets, notes, schedules, receipts and other documents relating to travel to and from drug source areas and drug distribution areas;
- (9) Records of real estate purchases, sales, and transfers to include but not limited to deeds, warranty deeds, quit claim deeds, closing statements, and appraisals.
- (10) Photographs, papers, tickets, notices, credit card receipts, travel schedules, travel receipts and records, passports, and/or records and other items relating to travel and transportation.
- (11) Telephone records and bills.
- (12) Bank statements, money orders, bank drafts, cashier's checks, bank checks, safe deposit box keys, money wrappers, wire transfer applications and/or receipts, fictitious identification.
- (13) United States Currency, Precious metals, jewelry, and financial instruments including but not limited to stocks and bonds, and vehicle registration and title documents.
- (14) Firearms;
- (15) Any and all other material evidence of violations of 21 U.S.C. §§ 841(a)(1), 843(b), 846, and 881 which include manufacturing, possession with intent to distribute and distribution of controlled substances.

68. Your affiant further submits that, based on my training, experience, and the facts described herein, the following residences are likely to contain documentary evidence (e.g., books, records, receipts, notes, ledgers, airline tickets, money orders, papers, and other documents) relating to the transportation, ordering, sale, and

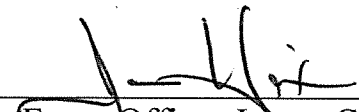
distribution of controlled substances, including evidence relating to the other properties listed herein:

- 5405 Autumn Wood Dr., Chattanooga, Tennessee; and
- 8578 Syntex Ln., Ooltewah, Tennessee.

Your affiant therefore respectfully submits that probable cause has been established to search these properties for the following materials related to drug trafficking and potential violations of Title 21, United States Code, Sections 841, 843, and 846:

- (1) Books, photographs, records, receipts, notes, ledgers and other papers which show the transportation, ordering, purchase, distribution, possession, sale or manufacture of controlled substances;
- (2) Address and/or telephone books and papers reflecting names, addresses, and/or telephone numbers, written or typed by hand as opposed to printed commercially;
- (3) Books, letters, records, computerized and electronic records, receipts, bank statements and records, money drafts, letters of credit, wire transfers, safe deposit box keys, money order and cashier's check receipts, passbooks, bank checks, and other items that reflect the expenditure, obtaining, secreting, transfer or concealment of drug proceeds;
- (4) United States currency, precious metals, jewelry, and financial instruments, including, but not limited to, stocks and bonds, notes and other documents showing an accumulation of assets, wealth, or money to the extent that these items are found in such quantity, substance and/or quality as to permit a reasonable inference that such items are proceeds of drug trafficking; and
- (5) Papers, tickets, notes, schedules, receipts and other documents relating to travel to and from drug source areas and drug distribution area.

FURTHER THIS AFFIANT SAYETH
NAUGHT.



Task Force Officer James C. Hixson,
Drug Enforcement Administration

Subscribed and sworn to before me this 4th day of April, 2017.



HONORABLE CHRISTOPHER H. STEGER
UNITED STATES MAGISTRATE JUDGE